

Hon. Franklin Burgess
U.S. District Judge

Hon. J. Kelley Arnold
U.S. Magistrate Judge

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

SANDRA HERRERA, et al,

Plaintiffs,

v.

PIERCE COUNTY, et. al,

Defendants.

NO. C95-5025-FDB

STIPULATION FOR EXTENSION OF
TIME FOR REPORT TO COURT WITH
RESPECT TO PROPOSED MONITORS
AND ORDER APPROVING
STIPULATION

Deleted: [PROPOSED]

INTRODUCTION

The Court has ordered that Dr. Steve Shelton be removed as the Court Monitor and directed counsel for parties to propose the names of two monitors (Docket No. 145). The Court has directed counsel to provide estimated costs for each proposed monitor.

The parties have conferred and were prepared to make with a single, agreed recommendation. Unfortunately, on Monday August 13, 2007, the parties learned that the agreed upon nominee had taken a new position and no longer had time to perform as Court Monitor in this case

STIPULATION

The Parties stipulate that an additional three weeks, to Wednesday September 5, 2007 should be allowed so that the parties may each further evaluate other nominees, including but

STIPULATION FOR EXTENSION OF TIME FOR
REPORT TO COURT WITH RESPECT
TO PROPOSED MONITORS - 1
No. 95-5025-FDB

Fred Diamondstone
ATTORNEY AT LAW
710 Second Avenue, # 700
Seattle WA 98104
(206) 568-0082
(206) 568-1683 FAX

1 not limited to Dr. Joe Goldenson of California and Dr. Joseph Paris of Georgia, in an effort to
2 determine whether a joint nomination might be made, or whether the parties will each make
3 one or two nominations for the Court's consideration.

4 Respectfully Submitted this: _____ day of August, 2007.

6 **LAW OFFICES OF**
7 **FRED DIAMONDSTONE**

8 s/ Fred Diamondstone
9 Fred Diamondstone, WSBA No. 7138
10 Attorney for Plaintiff
11 710 2nd Avenue, Suite 700
12 Seattle, WA 98104
13 Telephone: (206) 568-0082
14 Fax: (206) 568-1683
15 E-mail: fdiamondstone@seanet.com

16 **GORDON THOMAS HONEYWELL**
17 **MALANCA PETERSON & DAHEIM**

18 s/ Sal Mungia
19 Sal Mungia, WSBA No. 14807
20 Gordon, Thomas, Honeywell,
21 Malanca, Peterson & Daheim
22 Wells Fargo Plaza
23 1201 Pacific Avenue, Suite 2100
24 Tacoma, Washington 98401-1157
25 E-mail: smungia@gth-law.com

26 **GERALD A. HORNE**
PIERCE COUNTY PROSECUTOR

s/ Douglas Vanscoy
Douglas Vanscoy
Deputy Prosecuting Attorney
955 Tacoma Ave. South, Suite 301
Tacoma, WA 98402-2160
E-mail: dvansco@co.pierce.wa.us

STIPULATION FOR EXTENSION OF TIME FOR
REPORT TO COURT WITH RESPECT
TO PROPOSED MONITORS - 2
No. 95-5025-FDB

Fred Diamondstone
ATTORNEY AT LAW
710 Second Avenue, # 700
Seattle WA 98104
(206) 568-0082
(206) 568-1683 FAX

ORDER

IT IS HEREBY ORDERED that the Stipulation is APPROVED and that the parties shall file a joint report or separate reports concerning the nomination of a new Court Monitor with respect to medical care at the Pierce County Detention Center (Jail) on or before September 5, 2007.

DONE IN CHAMBERS this: 20th day of August, 2007.

Formatted: Superscript

Deleted:

/s/ J. Kelley Arnold

Hon. J. Kelley Arnold
United States Magistrate Judge

Presented By:

s/Fred Diamondstone
Of Attorneys for Plaintiff

Approved:

s/Douglas Vanscoy
Deputy Prosecuting for Pierce County
Attorney for Defendants

STIPULATION FOR EXTENSION OF TIME FOR
REPORT TO COURT WITH RESPECT
TO PROPOSED MONITORS - 3
No. 95-5025-FDB

Fred Diamondstone
ATTORNEY AT LAW
710 Second Avenue, # 700
Seattle WA 98104
(206) 568-0082
(206) 568-1683 FAX

DECLARATION OF SERVICE

I hereby certify that on _____ I electronically filed the foregoing
REPORT TO COURT WITH RESPECT TO PROPOSED MONITORS with the Clerk of
the Court using the CM/ECF system which will send notification of such filing to the
following:

Salvador A. Mungia

Gordon Thomas Honeywell Malanca
Peterson & Daheim
PO Box 1157
Tacoma, WA 98401-1157
smungia@gth-law.com

Douglas Vanscoy

Deputy Prosecuting Attorney
955 Tacoma Ave. South, Suite 301
Tacoma, WA 98402-2160
dvansco@co.pierce.wa.us

Additionally, a copy is being mailed to:

Craig Adams

Legal Advisor to the Sheriff
Pierce Co. Sheriff's Office
930 Tacoma Avenue South
Tacoma, WA 98402-2160

s/ Fred Diamondstone

Fred Diamondstone, WSBA No. 7138
Attorney for Plaintiff
710 2nd Avenue, Suite 700
Seattle, WA 98104
Telephone: (206) 568-0082
Fax: (206) 568-1683
E-mail: fdiamondstone@seanet.com

STIPULATION FOR EXTENSION OF TIME FOR
REPORT TO COURT WITH RESPECT
TO PROPOSED MONITORS - 4
No. 95-5025-FDB

Fred Diamondstone
ATTORNEY AT LAW
710 Second Avenue, # 700
Seattle WA 98104
(206) 568-0082
(206) 568-1683 FAX